

EXHIBIT "A"

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:

Jeffrey A Brennan & Margaret J Brennan
Debtors

CHAPTER 13

CASE NO.: 21-10278-elf

HEARING DATE: January 18, 2022

TIME: 9:30 A.M.

LOCATION: COURTROOM #1

**STIPULATION RESOLVING MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

It is hereby stipulated by and between Hill Wallack, LLP, counsel for Bank of America, N.A. ("Movant"), and Brad J. Sadek, Esquire, counsel for the Debtors Jeffrey A. Brennan and Margaret J. Brennan ("Debtors"), as follows:

1. The Automatic Stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. This Stipulation pertains to the property located at 109 E. Manoa Rd., Havertown, PA 19083 (the "Property").
3. The parties acknowledge that the current regular post-petition payment is \$1,350.22.
4. The parties acknowledge that the total post-petition arrearage due to Movant consists of the July 1, 2021 through September 1, 2021 post-petition payments in the amount of \$4,232.04 (\$1,410.68 x 3 months) and the post-petition payments due October 1, 2021 through January 1, 2022 in the amount of \$5,400.88 (\$1,350.22 x 4 months) plus attorney fees and costs in the amount of \$1,238.00, minus suspense in the amount of \$808.28, for a total of \$10,062.64.
5. Debtors are to file an Amended Chapter 13 Plan within 30 days of entry of this Order, incorporating the post-petition arrears in the amount of \$10,062.64, in addition to the pre-

petition arrears in the amount of \$36,168.68 per Proof of Claim 2-1, to be cured over the life of the Debtors' Chapter 13 Plan.

6. Beginning February 1, 2022, Debtors shall resume payment of the regular monthly payment in the amount of \$1,350.22/mo.

7. All post-petition payments from Debtor to Movant shall be sent to Carrington Mortgage Services, LLC at the following address: P.O. Box 660586, Dallas, TX 75266-0586.

8. Should the Debtors fail to file the Amended Chapter 13 Plan within 30 days of this Order, or if any regular monthly mortgage payment commencing February 1, 2022 is more than fifteen (15) days late for the remainder of this bankruptcy, Movant shall send Debtors and Debtors' counsel a written Notice of Default of this Stipulation. If the default is not cured within fifteen (15) days of the date of the Notice, Movant shall file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay and Co-Debtor Stay, waiving FED. R. Bankr. P. 3002.1 and waiving Rule 4001 (a)(3) so that the Relief Order is immediately effective and enforceable.

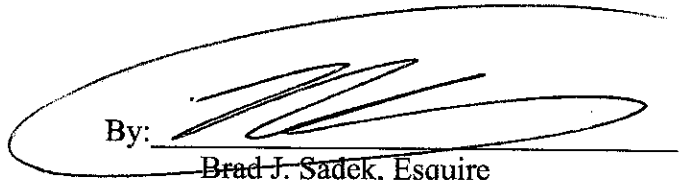
9. In the event the Debtors convert to a Chapter 7 during the pendency of this bankruptcy case, the Debtors shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, Movant shall send Debtors and Debtors' counsel a written Notice of Default of this Stipulation. If the default is not cured within ten (10) days of the date of the Notice, Movant shall file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay, waiving FED. R. Bankr. P. 3002.1 and waiving Rule 4001 (a)(3) so that the Relief Order is immediately effective and enforceable.

10. Debtors' tendering of a check to Movant, which is subsequently returned due to insufficient funds in the account upon which the check is drawn, shall not constitute payment as the term is used in this Stipulation.

11. The parties stipulate that Movant shall be permitted to communicate with the Debtors and Debtors' Counsel to the extent necessary to comply with applicable non-bankruptcy law.

12. The parties agree that a facsimile signature shall be considered an original signature.

By: /s/Kaitlin D. Shire, Esq.
Kaitlin D. Shire, Esquire
Counsel for Creditor

By: 
Brad J. Sadek, Esquire
Counsel for Debtor

/s/LeRoy W. Etheridge, Esquire
For Kenneth E. West, Chapter 13 Trustee

*no objection to its terms, without
prejudice to any of our rights and remedies

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**ORDER APPROVING THE STIPULATION RESOLVING MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

AND NOW, this ____ day of _____, 2022, it is hereby ORDERED that the
corresponding Stipulation is hereby approved, shall be, and is hereby made an Order of this Court.

BY THE COURT:

Eric L. Frank, USBJ